

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

**DECLARATION OF MATTHEW B. MCGUIRE IN SUPPORT OF  
FTX RECOVERY TRUST'S MOTION FOR RECONSIDERATION OR TO MODIFY  
ORDER ALLOWING RHEINGANS-YOO'S FDU CLAIM**

I, Matthew B. McGuire, hereby declare under penalty of perjury:

1. I am a member in good standing of the Bar of the State of Delaware and have been admitted to practice before this Court. I am a partner of Landis Rath & Cobb LLP and am one of the attorneys representing the FTX Recovery Trust in the above-captioned proceedings. I submit this declaration in support of the *FTX Recovery Trust's Motion for Reconsideration or to Modify Order Allowing Rheingans-Yoo's FDU Claim* (the "Motion"), filed concurrently herewith, to place before the Court certain documents and information referenced in the Motion.<sup>2</sup>

2. Attached hereto as **Exhibit 1** is a true and correct copy of a March 15, 2023 Time article titled "Exclusive: Effective Altruist Leaders Were Repeatedly Warned About Sam Bankman-Fried Years Before FTX Collapsed," accessed on July 23, 2025, and available at <https://time.com/6262810/sam-bankman-fried-effective-altruism-alameda-ftx/>.

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<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

3. Attached hereto as **Exhibit 2** is a true and correct copy of a 2017 article by William MacAskill titled “Effective Altruism: Introduction,” accessed on July 16, 2025, and available at <https://commons.pacificu.edu/work/sc/a3bc869a-d6aa-4bb4-837b-3dcf6847199e>.

4. Attached hereto as **Exhibit 3** is a true and correct copy of a page on the Effective Altruism Sweden website titled “Earning to Give,” accessed on July 16, 2025, and available at <https://www.effektivaltruism.org/en/earning-to-give/>.

5. Attached hereto as **Exhibit 4** is a true and correct copy of Samuel Bankman-Fried’s LinkedIn page, accessed on July 17, 2025, and available at <https://bs.linkedin.com/in/sam-bankman-fried-8367a346>.

6. Attached hereto as **Exhibit 5** is a true and correct excerpt of a November 18, 2022 Fortune article titled “Sam Bankman-Fried and Alameda CEO Caroline Ellison Spoke About Red Flags 3 Months Before It Collapsed. Here’s What They Said—and How They Lied,” accessed on July 23, 2025, and available at <https://fortune.com/2022/11/18/sam-bankman-fried-alameda-ceo-caroline-ellison-spoke-red-flags-ftx-3-months-before-it-collapsed-what-said-how-lied/>.

7. Attached hereto as **Exhibit 6** is a true and correct copy of a December 21, 2022 New York Times article titled “Two Executives in Sam Bankman-Fried’s Crypto Empire Plead Guilty to Fraud,” accessed on July 23, 2025, and available at <https://www.nytimes.com/2022/12/21/technology/ftx-fraud-guilty-pleas.html>.

8. Attached hereto as **Exhibit 7** is a true and correct copy of a March 1, 2023 Wall Street Journal article titled “How FTX’s Nishad Singh, Once an Honors Student, Turned to Crypto Crime,” accessed on July 17, 2025, and available at <https://www.wsj.com/finance/currencies/how-ftxs-nishad-singh-once-an-honors-student-fell-into-crypto-crime-a37197a9>.

9. Attached hereto as **Exhibit 8** is a true and correct copy of a February 28, 2023 Forbes article titled “Effective Altruism-Linked Group Used Millions Donated By FTX To Buy A Czech Castle,” accessed on July 17, 2025, and available at <https://advance.lexis.com/api/permalink/7d60412a-636f-411e-8300-81ef32270082/?context=1000516>.

10. Attached hereto as **Exhibit 9** is a true and correct copy of the homepage of Lighthaven’s website, accessed on July 18, 2025, and available at <https://www.lighthaven.space/>.

11. Attached hereto as **Exhibit 10** is a true and correct copy of the “About” page of Manifold Markets’ website, accessed on July 21, 2025, and available at <https://manifold.markets/about>.

12. Attached hereto as **Exhibit 11** is a true and correct copy of a June 6, 2022 email from Stephen Grugett, Cofounder of Manifold Markets, to investors of Manifold Markets.

13. Attached hereto as **Exhibit 12** is a true and correct copy of an email thread, dated May 17, 2022 to June 15, 2022, between Austin Chen of Manifold Markets and employees of FTX Philanthropy.

14. Attached hereto as **Exhibit 13** is a true and correct copy of an email thread, dated June 26, 2025 to July 2, 2025, between counsel for the FTX Recovery Trust and counsel for Ross Rheingans-Yoo.

15. Attached hereto as **Exhibit 14** is a true and correct copy of a July 5, 2023 blog post by Austin Chen titled “Announcing Manifold Regrants,” accessed on July 16, 2025, and available at <https://www.lesswrong.com/posts/uq4BABSnyH6E8aArA/announcing-manifold-regrants>.

16. Attached hereto as **Exhibit 15** is a true and correct copy of Manifold for Charity's 2022 Form 990 tax return, accessed on July 21, 2025, and available at <https://projects.propublica.org/nonprofits/organizations/883668801>.

17. Attached hereto as **Exhibit 16** is a true and correct copy of Manifold for Charity's 2023 Form 990 tax return, accessed on July 21, 2025, and available at <https://projects.propublica.org/nonprofits/organizations/883668801>.

18. Attached hereto as **Exhibit 17** is a true and correct copy of a page on Manifold Markets' Notion site hosting documents, accessed on July 16, 2025, and available at <https://manifoldmarkets.notion.site/c99d2ce9dfd3419090818122c0b4d540?v=1e754492ea7a800c90d2000caa588c7e>.

19. Attached hereto as **Exhibit 18** is a true and correct copy of the homepage of the "Manifest 2025" website, accessed on July 16, 2025, and available at <https://manifest.is/>.

20. Attached hereto as **Exhibit 19** is a true and correct copy of a January 11, 2025 blog post hosted on Ross Rheingans-Yoo's blog site, accessed on July 16, 2025, and available at <https://blog.rossry.net/chisness/>.

21. Attached hereto as **Exhibit 20** is a true and correct copy of a December 14, 2024 blog post hosted on Ross Rheingans-Yoo's blog site, accessed on July 16, 2025, and available at <https://blog.rossry.net/donations-2024/>.

22. Attached hereto as **Exhibit 21** is a true and correct copy of Manifold for Charity's Bylaws, accessed on July 22, 2025, and accessible at <https://manifoldmarkets.notion.site/Manifold-for-Charity-Inc-Legal-Docs-951f19f484bc47b2881e2c4f4cce7557>.

23. Attached hereto as **Exhibit 22** is a true and correct copy of notes from a May 13, 2025 Manifold for Charity meeting, accessed on July 16, 2025, and available at <https://manifoldmarkets.notion.site/c99d2ce9dfd3419090818122c0b4d540?v=d96610d8da914f46b6c42d2d2a4395d5&p=1f254492ea7a8058b44eec748bca647f&pm=c>.

24. Attached hereto as **Exhibit 23** is a true and correct copy of notes from an April 17, 2025 Manifold for Charity meeting, accessed on July 16, 2025, and available at <https://manifoldmarkets.notion.site/Manifund-Standup-1d854492ea7a8192891fc74b4a029f83#1d854492ea7a80c5a221f2c284a5a400>.

25. Attached hereto as **Exhibit 24** is a true and correct copy of notes from an April 18, 2025 Manifold for Charity meeting with Gabriel Bankman-Fried, accessed on July 16, 2025, and available at <https://manifoldmarkets.notion.site/Jesse-x-Gabe-1d854492ea7a80188a64fbf76d47d366#1d854492ea7a8016b4cdf2a795476153>.

Executed in Wilmington, Delaware on this 23<sup>rd</sup> day of July 2025.

/s/ Matthew B. McGuire  
Matthew B. McGuire (No. 4366)